

In The United States District Court
For The District Of Nebraska

United States | CASE NO. 09-CR-457

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Motion In Limine

Shannon Williams

Now Comes Shannon Williams, pro-se, and moves the court to grant a motion in limine to prohibit the in-court identification of DeShawn HERNANDEZ by government witness Kara Steckler. Said identification was gathered by an impermissible suggestive photo line-up in which after Ms. Kara Steckler could not identify Mrs. DeShawn HERNANDEZ or Mr. TyREISE HERNANDEZ Police Officers showed photos of co-defendants DeShawn HERNANDEZ & TyREISE HERNANDEZ by themselves INDIVIDUALLY AND OF COURSE GOVERNMENT WITNESS Kara Steckler positively identified the defendants. This is a clear violation of the defendants 5th Amendment Rights.

The defendant moves the court to suppress the live testimony of government witnesses Laura Adler, Clecia Woodell, & Jason Woodell as being in violation of the defendants 4th, 5th, 6th, & 14th Amendment rights to the U.S. Constitution. Said evidence was gathered through trickery & promises to not use the petitioners

Statements to AUSA Susan Lehr directly in a binding proffer & plea agreement. The government used both of my attorneys Steve Lefler and Terry Haddock's unconstitutional advise to trust AUSA Susan Lehr promise not to prosecute or use my statements against me. Both Steve Lefler and Terry Haddock can be heard on the government's own tapes advising the defendant to take the fake plea deal.

The government learned of the existence of these witnesses through false promises made to & through the defendants attorneys.

The government knew exactly what to offer & ask me during these proffers because the government was listening & recording my conversations with Mr. Lefler in direct violation of Weatherford v. Bursey.

Under the doctrine set forth in Weatherford v Bursey the defendant moves to suppress the live testimony of government witnesses Richard Conway, Cris Parrot, Mark Felix, Laura Adler and Anthony Parrot as in violation of defendant's 6th Amendment Right to effective assistance of counsel because the government recorded my privileged trial strategies with my retained counsel on these charges during the INVESTIGATIVE Stage - pre - INDICTMENT Stage of this CASE. According to Weatherford v Bursey there is no exception to this rule once the information is CONVEYED to the

GOVERNMENT PROSECUTORS. EVEN UNDER COVER AGENTS PROTECTING THEIR IDENTITY CANNOT INFORM THE GOVERNMENT OF THE STRATEGIES, PLANNED BY THE DEFENSE.

ATTORNEY STEVE LEFLER WAS THE DEFENDANT'S ATTORNEY OF RECORD FOR THE SUPERVISED RELEASE, THE ARIZONA CHARGES AND THE INDICTMENT. MR. LEFLER CLEARLY WAS WORKING AT UNIVERSAL AGREEMENT. SEE OCTOBER 1ST 2009 HEARING AND DECEMBER HEARING TESTIMONY, OF ATTORNEY LEFLER.

THE GOVERNMENT IS & HAS PLAYED AN UNCONSTITUTIONAL SHELL GAME WITH THE DEFENDANT'S RIGHTS. AT EVERY TURN EVERY LAWYER IS USED AGAINST THE DEFENDANT.

FINALLY THE DEFENDANT MOVES THE COURT UNDER THE RULE OF COMPLETENESS TO NOT ALLOW THE ADMITTANCE OF ANY OF THE TAPES. LEAD INVESTIGATOR STUCK HAS TESTIFIED THAT THE GOVERNMENT HAS NO EXPLANATION AS TO WHY TAPES ARE MISSING BUT IT'S THROUGH NO FAULT OF THE DEFENDANTS.

THE DEFENDANT WAS NOT MADE AWARE UNTIL 4:30 PM TODAY OF THE GOVERNMENT'S INTENTION TO CALL THESE WITNESSES & THE USE OF THE TAPES. SEE STUCK TESTIMONY DECEMBER HR. PG. 953

In conclusion the petitioner has NEVER WAIVED his Rights for Haddock to talk About my Attorney-client privileged conversations with Haddock for the previous year.

Petitioner NEVER WAIVED privilege AS it relates to STEVE LELLER

Wherefore the defendant plays the court exclude the live witness testimony of the forementioned GOVERNMENT WITNESSES including the petitioner's Attorney TERRY HADDOCK testifying Against the defendant.

Respectfully Submitted March 30, 2011

SIGNED: Shawn Weller